

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

**KIMBERLY HARTMAN**

**Plaintiff,**

**V.**

**CENTRA HEALTH, INC., and**

**STEPHANIE EAST,**

**Defendants.**

**Case No.: 6:20CV00027**

**DEFENDANT CENTRA HEALTH, INC.’S SUPPLEMENTAL RESPONSE TO  
PLAINTIFF’S MOTION TO PARTIALLY UNSEAL VDH RECORDS**

Defendant Centra Health, Inc. (“Centra”) provides this Supplemental Response to clarify its position and propose a way forward in light of Plaintiff’s Reply (ECF No. 80) in support of her Motion to Unseal VDH Records (ECF No. 71). Based on Plaintiff’s agreement “that any patient health information in the records that may exist needs to be kept confidential,” and “to treat all patient health records contained in the VDH filing (if any) as confidential information under the protective order,” Centra does not oppose her request “that the Court partially unseal the VDH filing (1) **for the limited purpose of disclosure to counsel for each party** and (2) **subject to a designation of confidentiality under the existing Protective Order.**” (ECF No. 80) (Emphasis added). The partial unsealing of these VDH records under these limited parameters (disclosure to counsel for each party only and designated and treated as confidential under the Protective Order) helps to address the privacy concerns that Centra expressed in its Response (ECF No. 77).

Centra reserves the right to seek additional protections on behalf of its patients, including an opportunity to redact any irrelevant patient health information. Because much of the VDH investigation and its findings had nothing to do with EMTALA, Centra also reserves the right to object to the discoverability, relevance or admissibility of these records or their use in this case.

Dated: October 4, 2021

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of October, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notice to the following counsel of record:

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/s/